

Exhibit D

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
AMARILLO DIVISION**

United States of America

ex rel. ALEX DOE, Relator,

The State of Texas

ex rel. ALEX DOE, Relator,

The State of Louisiana

ex rel. ALEX DOE, Relator,

Plaintiffs,

V.

Planned Parenthood Federation of America, Inc.,
Planned Parenthood Gulf Coast, Inc., Planned
Parenthood of Greater Texas, Inc., Planned
Parenthood South Texas, Inc., Planned Parenthood
Cameron County, Inc., Planned Parenthood San
Antonio, Inc.,

Defendants.

CIVIL ACTION NO. 2:21-CV-
00022-Z

Date: November 8, 2022

AFFILIATE DEFENDANTS' RULE 26(a)(1) THIRD SUPPLEMENTAL INITIAL
DISCLOSURES

Defendants Planned Parenthood Gulf Coast (“PPGC”), Planned Parenthood of Greater Texas, Inc. (“PPGT”), Planned Parenthood of South Texas, Inc. (“PP South Texas”), Planned Parenthood of Cameron County, Inc. (“PP Cameron County”), and Planned Parenthood San Antonio, Inc. (“PP San Antonio”) hereby supplement their Rule 26(a)(1) Initial Disclosures as follows:

I. RULE 26(a)(1)(A)(i) WITNESSES

Defendants hereby disclose this list of persons who Defendants believe are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants' knowledge to date.

Name	Contact Information	Subject Matter
Rebekah Gee Former Louisiana Health Secretary	1542 Tulane Avenue, Box T5-2 New Orleans, LA 70112 Phone: (504)568-4850	May have knowledge of facts related to PPGC's termination from Louisiana Medicaid and the administration of Louisiana Medicaid.
Kami Geoffray Former Senior Policy Advisor at the Health and Human Services Commission	This witness can be contacted through email at kami@geoffraystrategies.com or by telephone at (512) 765-4897	May have knowledge of facts related to PPGC's, PPST's, PPCC's, PPSA's, and PPGT's Texas Medicaid termination and the administration of Texas Medicaid.
Kay Ghahremani Former Texas Medicaid Director at the Health and Human Services Commission	3036 Thrushwood Dr., Austin, TX 78757	May have knowledge of facts related to PPGC's, PPST's, PPCC's, PPSA's, and PPGT's Texas Medicaid termination and the administration of Texas Medicaid.
Dr. Dara Havemann Former Co-Investigator of Reproductive Health Study at University of Texas Medical Branch	3600 Gaston Avenue Barnett Tower, Suite 1001 Dallas, TX 75246	May have knowledge of facts related to the UTMB studies.
David Maxwell Former Director of Law Enforcement Division, Texas Attorney General's Office	Witness should be contacted through legal counsel at Soltero Sapire Murrell PLLC 7320 N Mopac Suite 309 Austin, Texas 78731 (512) 422-1559 (phone)	May have knowledge of facts related to PPGT'S, PPST's, PPSA's, PPCC's and PPGC's Texas Medicaid terminations.
Dr. Sara Mucowski Former Principal Investigator of Reproductive Health Study at University of	3600 Gaston Avenue Barnett Tower, Suite 1001 Dallas, TX 75246	May have knowledge of facts related to the UTMB studies.

Name	Contact Information	Subject Matter
Texas Medical Branch		
Dr. Silke Paust Former Reproductive Health Researcher at Baylor College of Medicine	Scripps Research 10550 North Torrey Pine, TPC-11, La Jolla, CA 92037 This witness can be contacted by telephone at (858) 784-2233	May have knowledge of facts related to the Baylor studies.
Dr. Richard Rupp Director of University of Texas Medical Branch	301 University Boulevard, Galveston, TX 77555	May have knowledge of facts related to the UTMB studies.
Steve Russo Executive Counsel for Louisiana Department of Health	628 N. 4th Street, Baton Rouge, LA 70802	May have knowledge of facts related to PPGC's termination from Louisiana Medicaid and the administration of Louisiana Medicaid
Kim Sullivan General Counsel for Louisiana Department of Health	628 N. 4th Street, Baton Rouge, LA 70802	May have knowledge of facts related to PPGC's termination from Louisiana Medicaid and the administration of Louisiana Medicaid
Dr. Chandrasekhar Yallampalli Former Principal Investigator of Reproductive Health Study at University of Texas Medical Branch	One Baylor Plaza, Houston, TX 77030	May have knowledge of facts related to the UTMB studies.

Defendants also believe that individuals currently or formerly employees are likely to have discoverable information that Defendants may use to support their claims or defenses, unless solely for impeachment, based on Defendants' knowledge to date.

Defendants also reserve the right to call any witness identified in the Plaintiffs' complaints, any witnesses that Defendants identify in response to Plaintiffs' discovery requests, and any witness that Plaintiffs identify as persons with relevant knowledge.

Dated: November 8, 2022

Respectfully submitted,

ARNOLD & PORTER KAYE SCHOLER
LLP

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CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2022, the foregoing Affiliate Defendants' Rule 26(a)(1) Third Supplemental Disclosures were served upon all counsel record by e-mail.

s/ *Tirzah S. Lollar*

Tirzah S. Lollar